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6 Attorneys for Defendant
 7 THE GOODYEAR TIRE & RUBBER COMPANY

8 UNITED STATES DISTRICT COURT
 9 CENTRAL DISTRICT OF CALIFORNIA
 10 SOUTHERN DIVISION
 11

Gordon & Rees LLP
 1111 Broadway, Suite 1700
 Oakland, CA 94607

12 LORNA M. WALEK, individually and)
 as successor-in-interest to JOHN J.)
 13 FINAZZO; J.R.F., a minor, by her)
 Guardian Ad Litem KRISTINE MARIE)
 14 HOLM; J.M.F., a minor, by his Guardian)
 Ad Litem KRISTINE MARIE HOLM;)
 15 and J.P.F., a minor, by his Guardian Ad)
 Litem KRISTINE MARIE HOLM,)
 16
 17 Plaintiffs,
 vs.
 18 3M COMPANY, et al.,
 19 Defendants.
 20

Case No.: 5:15-cv-00309-DOC-DTB

**~~PROPOSED~~ ORDER TO
 AMEND PROTECTIVE ORDER
 REGARDING CONFIDENTIAL
 AND EXPORT-CONTROLLED
 MATERIALS TO ADD
 DEFENDANT THE GOODYEAR
 TIRE & RUBBER COMPANY**

JUDGE: Hon. David O. Carter [398]

Gordon & Rees LLP
1111 Broadway, Suite 1700
Oakland, CA 94607

1 Pursuant to the stipulation between Plaintiffs and The Goodyear Tire &
2 Rubber Company, it is hereby ordered by the Court that the Protective Order
3 Regarding Confidential and Export Controlled Materials, entered by the Court on
4 May 14, 2015 as Document 316, and most recently amended on June 25, 2015 to
5 add Amended Exhibit A as Documents 363-1, shall be further amended to include
6 The Goodyear Tire & Rubber Company as a party in Paragraph 1 of the Protective
7 order to whom the terms and conditions of the Protective Order shall apply. The
8 Protective Order shall otherwise apply with the same force and the same terms and
9 previously set forth in Document 316.

10 IT IS SO Ordered.

11 Dated: September 10, 2015



Honorable David O. Carter
United States District Court Judge